

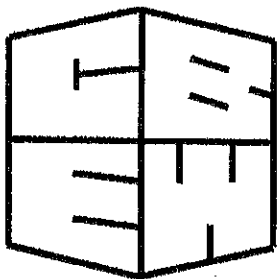
**RURAL WATER DISTRICT NO. 2  
NOBLE COUNTY  
Perry, Oklahoma**

**BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

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## **CBEW Professional Group, LLP**

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Charles E. Crooks, Jr., CPA – Trisha J. Rieman, CPA – Gabrielle M. Conchola, CPA

### **INDEPENDENT AUDITOR'S REPORT**

January 21, 2021

Board of Directors  
Rural Water District No. 2  
Noble County  
Perry, Oklahoma

#### ***Report on the Financial Statements***

We have audited the accompanying modified cash basis financial statements of Rural Water District No. 2, Noble County, Perry, Oklahoma (the District), as of and for the year ended December 31, 2020, and the related notes to the financial statements, as listed in the table of contents.

#### ***Management's Responsibility for the Financial Statements***

Management is responsible for the preparation and fair presentation of these financial statements in accordance with the modified cash basis of accounting described in Note 1; this includes determining that the modified cash basis of accounting is an acceptable basis for the preparation of the financial statements in the circumstances; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

#### ***Auditor's Responsibility***

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the comptroller General of the United States. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

***Opinion***

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position—modified cash basis of the business-type activities of the Rural Water District No. 2, Noble County, Perry, Oklahoma as of December 31, 2020, and the changes in financial position—modified cash basis, thereof for the year then ended in accordance with the basis of accounting as described in Note 1.

***Basis of Accounting***

We draw attention to Note 1 of the financial statements, which describes the basis of accounting. The financial statements are prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. Our opinion is not modified with respect to that matter.

***Other Reporting Required by Government Auditing Standards***

In accordance with *Government Auditing Standards*, we have also issued our report dated January 21, 2021, on our consideration of the Rural Water District No. 2's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and results of that testing, and not to provide an opinion on the internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Rural Water District No. 2's internal control over financial reporting and compliance.

***CBEW Professional Group, LLP***

CBEW Professional Group, LLP  
Certified Public Accountants  
Cushing, Oklahoma

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**STATEMENT OF NET POSITION  
MODIFIED CASH BASIS  
December 31, 2020**

	<b>December 31, 2020</b>
<b>Assets:</b>	
Cash and cash equivalents (Note 1)	\$ 194,774
Investments	264,318
Temporarily restricted assets:	
Cash and cash equivalents (Note 1)	53,179
Restricted assets:	
Customer deposits (Note 1)	147,245
<b>Capital assets:</b>	
Water system, buildings, improvements and equipment, net of depreciation (Notes 1 & 3)	<u>1,264,866</u>
<b>Total assets</b>	<u>1,924,382</u>
<b>Deferred outflows of resources:</b>	
<b>Total deferred outflows</b>	<u>-</u>
<b>Current liabilities:</b>	
Customer deposits	147,245
Current portion of notes payable (Note 3)	<u>13,500</u>
<b>Total current liabilities</b>	<u>160,745</u>
<b>Long-term liabilities:</b>	
Notes payable (Note 3)	<u>156,700</u>
<b>Total long-term liabilities</b>	<u>156,700</u>
<b>Total liabilities</b>	<u>317,445</u>
<b>Deferred inflows of resources:</b>	
<b>Total deferred inflows</b>	<u>-</u>
<b>Net position:</b>	
Net investment in capital assets	1,094,666
Temporarily restricted (Note 1)	53,179
Unrestricted	<u>459,092</u>
<b>Total net position</b>	<u>1,606,937</u>
<b>Total liabilities and net position</b>	<u><u>\$ 1,924,382</u></u>

The accompanying notes are an integral part of the basic financial statements.

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**STATEMENT OF ACTIVITIES  
MODIFIED CASH BASIS  
For the Year Ended December 31, 2020**

	<b>December 31, 2020</b>
<b>Revenues:</b>	
Water sales	\$ 605,158
Miscellaneous income	<u>30,842</u>
<b>Total revenues</b>	<u>636,000</u>
<b>Expenses:</b>	
Bank charges	74
Contract services	6,386
Depreciation	62,292
Insurance	11,259
Lab fees	1,147
Legal and accounting	1,315
Licenses and permits	1,155
Miscellaneous	5,250
Office supplies and postage	8,904
Repair and maintenance	9,621
Salaries and payroll expenses	143,340
Supplies	37,038
Telephone	7,059
Transportation	8,788
Travel	804
Utilities	10,857
Water purchases	<u>208,189</u>
<b>Total expenses</b>	<u>523,478</u>
<b>Operating income (loss)</b>	<u>112,522</u>
<b>Other income and expense:</b>	
Interest income	4,975
Interest expense	<u>(6,544)</u>
<b>Total other income and expense</b>	<u>(1,569)</u>
<b>Change in net position - net income (loss)</b>	110,953
<b>Net position - beginning of year</b>	<u>1,495,984</u>
<b>Net position - end of year</b>	\$ <u><u>1,606,937</u></u>

The accompanying notes are an integral part of the basic financial statements.

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**STATEMENT OF CHANGES IN NET POSITION  
MODIFIED CASH BASIS  
For the Year Ended December 31, 2020**

	<b>Net Position (Unrestricted)</b>	<b>Net Position (Temporarily Restricted)</b>	<b>Total Net Assets</b>
<b>Balance - beginning of year 12-31-19</b>	\$ 1,440,090	\$ 55,894	\$ 1,495,984
Change in net position	<u>113,668</u>	<u>(2,715)</u>	<u>110,953</u>
<b>Balance - end of year 12-31-20</b>	<u><u>\$ 1,553,758</u></u>	<u><u>\$ 53,179</u></u>	<u><u>\$ 1,606,937</u></u>

The accompanying notes are an integral part of the basic financial statements.

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**STATEMENT OF CASH FLOWS  
MODIFIED CASH BASIS  
For the Year Ended December 31, 2020**

	<b>December 31, 2020</b>
<b>Cash flows from operating activities:</b>	
Cash received from customers	\$ 636,000
Cash payments to suppliers for goods & contractors & other services	(461,186)
<b>Net cash provided by operating activities</b>	<u>174,814</u>
<b>Cash flows from capital and related financing activities:</b>	
Acquisition & construction of capital assets	-
Principal paid on debt	(12,500)
Interest paid on debt	(6,544)
Net change in meter deposits	13,250
Uses of (payments to) reserve accounts	2,715
<b>Net cash used in capital and related financing activities</b>	<u>(3,079)</u>
<b>Cash flows from investing activities:</b>	
(Purchase) liquidation of investments - unrestricted	(4,014)
Interest income	4,975
<b>Net cash provided by investing activities</b>	<u>961</u>
<b>Net increase (decrease) in cash</b>	172,696
<b>Cash and cash equivalents at beginning of year</b>	<u>169,323</u>
<b>Cash and cash equivalents at end of year</b>	<u>\$ 342,019</u>
<b>Reconciliation of operation income to net cash provided by operating activities:</b>	
Operating income (loss)	\$ <u>112,522</u>
<b>Adjustments to reconcile net income to net cash provided by operating activities:</b>	
Depreciation	62,292
Changes in assets and liabilities:	
(Increase) decrease in other assets	<u>-</u>
<b>Total adjustments</b>	<u>62,292</u>
<b>Net cash provided by operating activities</b>	<u>\$ 174,814</u>

The accompanying notes are an integral part of the basic financial statements.



**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES**

Rural Water District No. 2, Noble County, Oklahoma (the District), was created under the provisions of Title 82, O.S. 1981, Sections 1301-1321. The purpose of the District is to acquire water and water rights; to build and acquire pipelines and other facilities; and to operate the same for the purpose of providing water to serve the needs of owner and occupants of land located within the District, and others as authorized by the by-laws. The District is exempt from federal and state income taxes.

The District is governed by a Board of Directors that acts as the authoritative and legislative body of the entity. The Board of Directors is comprised of elected board members. All Board members serve without pay.

The more significant of the government's accounting policies are described below.

**A. Reporting Entity**

Rural Water District No. 2 is an independent, self-contained reporting entity with no associated component units. It is operated in a manner similar to a private business enterprise where the cost (expenses, including depreciation) of providing water services is financed through user charges. The District purchases all of its water from Lone Chimney Water Association.

**B. Measurement Focus, Basis of Accounting and Basis of Presentation – Fund Accounting**

The accompanying financial statements have been prepared on the modified cash basis of accounting, which is a basis of accounting other than accounting principles generally accepted in the United States of America. The accounting and financial reporting treatment is accounted for on a flow of economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operation are included on the statement of net position. The operating statements present increases (e.g., revenues) and decreases (e.g., expenses) in net total assets. Depreciation expense is provided for capital assets based upon estimated useful lives.

Financial activity is accounted for on the flow of economic resources measurement focus using the modified cash basis of accounting. Under this method, revenues are recorded when received and expenditures are recorded when paid.

**C. Assets, Liabilities and Equity**

**1. Deposits and Investments**

Oklahoma Statutes authorize the District to invest in certificates of deposit, repurchase agreements, passbooks, bankers' acceptances, and other available bank investments provided that all deposits are fully covered by approved securities pledged to secure those funds. In addition, the District can invest in direct debt securities of the United States unless such an investment is expressly prohibited by law.

All the bank deposits are held at one financial institution and are carried at cost. For purposes of statements of cash flows, the District considers cash and all highly liquid investments with an initial maturity of three months or less to be cash equivalents.

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)**

**C. Assets, Liabilities and Equity (Continued)**

**1. Deposits and Investments (Continued)**

*Custodial Credit Risk*

At December 31, 2020, the District held deposits of approximately \$659,516 at financial institutions. The District's cash deposits, including interest-bearing certificates of deposit, are entirely covered by Federal Depository Insurance (FDIC) or direct obligation of the U.S. Government insured or collateralized with securities held by the District or by its agent in the District's name.

*Investment Interest Rate Risk*

The District does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates.

*Investment Credit Risk*

The District has no policy that limits its investment choices other than the limitation of state law as follows:

- a. Direct obligations of the U.S. Government, its agencies and instrumentalities to which the full faith and credit of the U.S. Government is pledged, or obligations to the payment of which the full faith and credit of the State is pledged.
- b. Certificates of deposits or savings accounts that are either insured or secured with acceptable collateral with in-state financial institutions, and fully insured certificates of deposit or savings accounts in out-of-state financial institutions.
- c. With certain limitation, negotiable certificates of deposit, prime bankers acceptances, prime commercial paper and repurchase agreements with certain limitations.
- d. County, municipal or school district tax supported debt obligations, bond or revenue anticipation notes, money judgments, or bond or revenue anticipation notes of public trusts whose beneficiary is a county, municipality or school district.
- e. Notes or bonds secured by mortgage or trust deed insured by the Federal Housing Administrator and debentures issued by the Federal Housing Administrator, and in obligations of the National Mortgage Association.
- f. Money market funds regulated by the SEC and in which investments consist of the investments mentioned in the previous paragraphs (a.-d.).

The investments held at December 31, 2020 are as follows:

Type	Weighted Average Maturity (Months)	Credit Rating	Market Value	Cost
Investments				
CDs	N/A	AAAm	\$ 264,318	\$ 264,318
Total investments			<u>\$ 264,318</u>	<u>\$ 264,318</u>

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)**

**C. Assets, Liabilities and Equity (Continued)**

**1. Deposits and Investments (Continued)**

*Concentration of Investment Credit Risk*

The District places no limit on the amount it may invest in any one issuer. The District has the following of credit risk: 100% in Certificates of Deposits (\$264,318).

**2. Restricted Cash and Investments**

The restricted cash is the result of financial requirements of various note indentures between the District and the Rural Economic and Community development Agency. Under the terms and provisions of the promissory note, these funds may be maintained so long as the notes are outstanding. In addition, certain funds are restricted for customer deposits and are reflected as an asset and a corresponding liability.

**3. Fair Value of Financial Instruments**

The District's financial instruments include cash and cash equivalents, customer deposits payable, and notes payable. The District's estimate of the fair value of all financial instruments does not differ materially from the aggregate carrying values of its financial instruments recorded in the accompanying statement of net position. The carrying amount of these financial instruments approximates fair value because of the short maturity of these instruments.

**4. Estimates**

The preparation of financial statements requires management to make estimates and assumptions that affect certain reported amounts assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period.. Accordingly, actual results could differ from those estimates.

**5. Inventories**

Inventories consist primarily of water stored in lines for use in the distribution process. Inventory is expensed when purchased.

**6. Capital Assets**

Additions to the water storage delivery system and other equipment are recorded at cost or, if contributed property, at their estimated acquisition value at time of contribution. Repairs and maintenance are recorded as expenses; renewals and betterments are capitalized. The District maintains a capitalization threshold of \$500 and an estimated useful life in excess of two (2) years. Depreciation has been calculated on each class of depreciable property using the straight-line method. Estimated useful lives are as follows:

Water system	40 years
Equipment	10 years
Office equipment	10 years

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (CONTINUED)**

**C. Assets, Liabilities and Equity (Continued)**

**7. Compensated Absences**

It is the District's policy to permit employees to accumulate earned but unused vacation time. Full-time employees are granted vacation and sick leave benefits in varying amounts to specified maximums depending on tenure. The District has not accrued compensated absences because the amount, if any, would not be material to the financial statements.

**8. Net Position**

In the basic financial statements, net position represents the difference between assets and liabilities. Net position invested in capital assets, net of related debt, consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of any borrowing used for the acquisition, construction, or improvement of those assets.

**9. Resource Use Policy**

It is in the District's policy for all funds that when an expenditure/expense is incurred for purposes for which both restricted and unrestricted resources, including net positions, are available, the District considers restricted amounts to be spent first before any unrestricted amounts are used.

**D. Revenues, Expenses and Other Changes in Net Position**

**1. Operating Revenues and Expenses**

Operating revenues and expenses are principally from water sales and connection fees charged to new system subscribers. Customer water consumption is determined by monthly meter readings taken by the District personnel. The water sales from subscriber water consumption received at the District's year-end are recognized as revenue in the current year. Operating expense consist of those costs necessary to operate and maintain the water distribution system and for general administration of the District.

**2. Non-Operating Revenue and Expenses**

Non-operating revenues and expenses consist of investment earnings, interest expense incurred on the District's notes payable and gains and losses on sales or the abandonment of long-lived assets.

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**2. CAPTIAL ASSETS**

The following is a summary of changes in property, plant and equipment.

	Balance December 31, 2019	Additions	Deletions	Balance December 31, 2020
Water system	\$ 2,386,205	\$ -	\$ -	\$ 2,386,205
Buildings	183,861	-	-	183,861
Machinery & equipment	201,283	-	-	201,283
Furniture & fixtures	28,254	-	-	28,254
Total	2,799,603	-	-	2,799,603
Less accumulated depreciation	1,472,445	62,292	-	1,534,737
Net	<u>\$ 1,327,158</u>	<u>\$ (62,292)</u>	<u>\$ -</u>	<u>\$ 1,264,866</u>

**3. LONG-TERM DEBT**

Long-term debt consisted of a note with Oklahoma Water Resources Board (OWRB). The note is secured by the distribution lines, related equipment and water revenues derived from operations.

The note is listed as follows:

Loan OWRB – Original amount of \$510,000, payable in monthly installments of varying amounts of principal and semi-annual installments of interest for 30 years at varying interest rates to combine all existing debt into one loan, maturing in 2029.

The following is a summary of long-term debt transactions during the year:

	Balance December 31, 2019	Additions	Reductions	Balance December 31, 2020	Current Portion
OWRB	\$ 182,700	\$ -	\$ 12,500	\$ 170,200	\$ 13,500
Total	<u>\$ 182,700</u>	<u>\$ -</u>	<u>\$ 12,500</u>	<u>\$ 170,200</u>	<u>\$ 13,500</u>

Annual cash requirements to amortize these notes are as follows:

Year Ending December 31,	Payments Due
2021	\$ 18,090
2022	18,911
2023	19,698
2024	20,452
2025	21,373
2026-2029	96,356
Total	194,880
Less interest	(24,680)
Note balance	<u>\$ 170,200</u>

**RURAL WATER DISTRICT #2  
NOBLE COUNTY  
Perry, Oklahoma**

**NOTES TO THE BASIC FINANCIAL STATEMENTS  
December 31, 2020**

**4. RISK MANAGEMENT**

Rural Water District No. 2 is exposed to various risks of loss related to torts; theft of, damage to, and destruction of assets; errors and omissions; injuries to employees; and natural disasters. The District continues to carry commercial insurance for these risks, including general and auto liability, property damage, and public officials' liability. Settled claims resulting from these risks have not exceeded the commercial insurance coverage in any of the past three fiscal years.

**5. WATER PURCHASE COMMITMENT**

The governing board of Rural Water District No. 2, Noble County, Perry, Oklahoma, together with five other cities and water districts located in Noble, Perry, and Payne Counties, Oklahoma, have jointly formed Lone Chimney Water Association. The purpose of the Association is to provide a water system for the benefit of its members and other users. The District has entered into various loan agreements with the United States Department of Agriculture, Rural Development and the Oklahoma Water Resources board to provide financing for the facility. Under the terms of the agreement regarding Rural Water District No. 3, each member has contracted to purchase a minimum amount of water from the Association during the 40-year term of the notes. In addition, each individual member is proportionately liable for any debts that exceed the assets of the Association to the extent of one and one-half times the percentage of ownership interest held by the entity pursuant to the agreement. The District is contingently liable for 12% of the obligations of the Association, which total approximately \$4,010,730 to the Oklahoma Water Resources Board at the year-end. The District's contingent share of Lone Chimney Water Association's debt is \$481,288.

At December 31, 2020, Rural Water District No. 2 was obligated to purchase a minimum of 24.96 million gallons of water annually, currently at a cost of \$146,000. The rates charged for the water can be adjusted every three years as necessary to provide sufficient revenues for the Association.

Future purchase commitments at current rates are as follows:

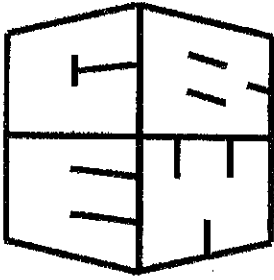
June 30,	Amounts Due
2021	\$ 146,000
2022	146,000
2023	146,000
2024	146,000
2025	146,000
2023-2029	730,000
2030-2031	292,000
Total	\$ <u>1,752,000</u>

**6. SUBSEQUENT EVENTS**

Management has evaluated subsequent events and transactions through the date of the audit report, which is the date the financial statements were available to be issued. Management is currently evaluating the impact of the COVID-19 pandemic on the District and has concluded that while it is reasonably possible that the virus could have a negative effect on the District's financial position and results of its operations, the specific impact is not readily determinable as of the date of these financial statements. The financial statements do not include any adjustments that might result from the outcome of this uncertainty.

**RURAL WATER DISTRICT NO. 2  
NOBLE COUNTY  
Perry, Oklahoma**

**REPORT REQUIRED BY *GOVERNMENT AUDITING STANDARDS*  
December 31, 2020**



## **CBEW Professional Group, LLP**

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Charles E. Crooks, Jr., CPA – Trisha J. Rieman, CPA – Gabrielle M. Conchola, CPA

### **INDEPENDENT AUDITOR'S REPORT ON INTERNAL CONTROL OVER FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN ACCORDANCE WITH GOVERNMENT AUDITING STANDARDS**

January 21, 2021

Board of Directors  
Rural Water District No. 2  
Noble County  
Perry, Oklahoma

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the modified cash basis financial statements of the business-type activities of the Rural Water District No. 2, Noble County, Perry, Oklahoma (the District), as of and for the year ended December 31, 2020, and the related notes to the financial statements, which collectively comprise the District's basic financial statements, and have issued our report thereon dated January 21, 2021.

#### ***Internal Control Over Financial Reporting***

In planning and performing our audit of the financial statements, we considered the District's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the District's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or, significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that were not identified. We did identify certain deficiencies in internal control, described in the accompanying schedule of findings and responses that we consider to be material weaknesses as finding 2020-001.



### ***Compliance and Other Matters***

As part of obtaining reasonable assurance about whether the District's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### ***District's Response to Findings***

The District's response to the findings identified in our audit is described in the accompanying schedule of findings and responses. The District's response was not subjected to the auditing procedures applied in the audit of the financial statements and, accordingly, we express no opinion on it.

### ***Purpose of this Report***

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

***CBEW Professional Group, LLP***

CBEW Professional Group, LLP  
Certified Public Accountants  
Cushing, Oklahoma

**RURAL WATER DISTRICT NO. 2  
NOBLE COUNTY  
Perry, Oklahoma**

**SCHEDULE OF FINDINGS AND RESPONSES  
For the Year Ended December 31, 2020**

2020-001. Internal Control – Segregation of Duties

**Criteria:** The segregation of duties and responsibilities between different individuals for custody of assets, recordkeeping for those assets and reconciliation of those asset accounts is an important control activity needed to adequately protect the district's assets and ensure accurate financial reporting.

**Condition:** Presently the same individual that receives utility service-related cash payments is also responsible for service billing and adjustment, also balances the daily cash drawer, posts payments to subsidiary accounts receivable ledger and reconciles the monthly bank statements. In addition, only limited oversight is provided over this individual in the conduct of their daily functions.

**Cause:** The district's limited size and staffing resources have made it difficult for management to provide sufficient staffing to fully segregate incompatible duties in a cost-effective manner.

**Effect or Potential Effect:** Without sufficient segregation of duties, the risk significantly increases that errors and fraud related to utility billing and collection activities, including misappropriation of assets, could occur and not be detected within a timely basis.

**Recommendation:** We recommend that management and the board should consider a formal evaluation of their risks associated with this lack of duties segregation over utility cash and receivables. In response to the identified risks, consideration should be given to identifying and implementing controls that could help mitigate the risks associated with lack of segregation of duties, such as providing increased management oversight and an independent reconciliation of accounts. For example, the entity might consider soliciting the assistance of independent volunteer labor to perform certain functions including performing compensating procedures where applicable.

**Responsible Official's Response:** The district concurs with the recommendation, although, the cost to correct this condition might exceed the benefit, the district will review for changes in procedures that will improve the overall lack of segregation of duties.